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December 15, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: November/December 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the November/December 2015 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from November 15, 2015, to December 14, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Groundwater monitoring was conducted the week of December 8, 2015. Last quarter, a more comprehensive monitoring was conducted per EPA's request. This quarter sampling was conducted in accordance with the 2007 Remedial Action Pilot Study Performance Monitoring Plan. Activities conducted:
 - Record groundwater level measurements in the monitoring well network.
 - Collect groundwater samples from the monitoring well network.
 - Collect a composite groundwater sample from the extraction wells.
 - Inspect the sorbent socks in the recovery wells and replace if saturated.

Results will be reported once the data has been received from the laboratory and validated.

- In August and early September, the CMS was revised (Version 4) to incorporate the results of the oxidation bench scale study and incorporate EPA comments. EPA informed the Baxter team that Battelle had been contracted to review the data from the site and provide corrective measure recommendations to EPA. EPA requested that the Baxter team place the CMS on hold until the Battelle report is completed and EPA and Baxter teams have met to discuss the



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ramifications of the Battelle recommendations. No work was conducted on the CMS this month pending direction from EPA.

- The recirculation system continued to operate at 30 gpm. The iSOC oxygen tanks were replaced during the sampling event in early December.
- The SADD report is under preparation and will be delivered to EPA by December 31, 2015.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- EPA will provide the Baxter team with the Battelle report and set up a technical meeting to discuss the path forward.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Groundwater monitoring was conducted the week of December 8. Results are pending and will be reported after data validation has been completed. Nothing unusual was noted during sampling.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

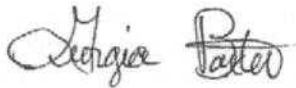
Signature:



Name: Georgia Baxter
Title: Chief Executive Officer
Date: December 15, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

